



## Managing Used Oil Properly

**W**hat is used oil? Used oil can be synthetic oil or any oil that has been refined from crude oil. In either case it is considered used oil if it has become dirty through use. Used oil includes any of the following after it has been used: motor oil, transmission fluid, gear oil, cutting oil, hydraulic oil, and power-steering fluids.

If used oil is to be recycled, it can be managed under the Used Oil Management Standards (UOMS) found in WAC 173-303-515. In this case, recycling includes burning for energy recovery. If the oil is not recycled, it is a solid waste and may also be a dangerous waste subject to more stringent regulations.

Other kinds of oily wastes, referred to as "materials containing or otherwise contaminated with used

oil" can also be managed under the UOMS when burned for energy recovery. This category of used oil occurs when used oil combines with a product during the intended use of that product. Examples include a spill of oil being cleaned up with "kitty litter" or other adsorbents and non-hazardous solvents such as "high flash" solvents used to clean engine parts.

Oily wastes that don't meet the definition of used oil or the exceptions mentioned above cannot be managed as used oil. Examples include brake cleaner, solvents with a flashpoint below 140° F (including petroleum distillates and mineral spirits), paint and oily paint waste, anti-freeze, and carburetor cleaners.

The intentional mixing of anything with used oil is prohibited. Mixing solid waste with used oil will create a mixture that cannot be managed as used oil and may even be a dangerous waste. Mixing dangerous waste with used oil will cause the entire mixture to be regulated as dangerous waste.

If used oil is to be recycled, then dangerous waste designation is not required. However, if test results show the presence of dangerous waste constituents, it is the generator's responsibility to prove that the oil was not mixed with a dangerous waste. The generator can do this in one of two ways. An approved

testing method can be used to demonstrate that there are no dangerous waste constituents in the used oil; or documented knowledge can be used to show that the oil was contaminated through use, not through mixing.

To ensure that used oil does not become contaminated with hazardous waste it is a good idea to remove chlorinated products and other halogenated hydrocarbons from the work area.

Although the burning of used oil for energy recovery is a common recycling activity, Ecology strongly encourages the re-refining of used oil. This is one reason Ecology has prohibited the intentional mixing of any other material with used oil. This "clean" oil is more suitable for re-refining.

Ecology is developing a used oil pamphlet that will be available soon. If you would like to be notified when this is available, please send your e-mail address or mailing address to Dave Zink at [dzin461@ecy.wa.gov](mailto:dzin461@ecy.wa.gov) or call (360) 407-6752. To be completely sure of your responsibilities when managing used oil, refer to WAC 173-303-515 or contact a hazardous waste specialist at your Ecology regional office.



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## Help Reduce Antifreeze Contamination

Some recycling companies recently found significant amounts of contamination in antifreeze that was sent to them for recycling. This contamination can often cause the antifreeze to designate as hazardous waste, which is more expensive to manage and eliminates the option of recycling. These extra costs may get passed back to the generator. All generators of used antifreeze need to work to reduce contamination.

Antifreeze is an ethylene glycol-based coolant that is used as a heat exchange medium in motor vehicle radiators, motorized equipment, and some industrial processes. As a rule of thumb, if there is more than 50% ethylene glycol present, used antifreeze is regulated as a hazardous waste due to its toxicity. Used antifreeze can also be hazardous due to lead and other metal contaminants.

In 1994, Ecology designed a pilot project to increase the recycling rates of used antifreeze by easing the generator's requirements. The project was successful, and the reduced requirements for managing used antifreeze were made a permanent part of the *Dangerous Waste Regulations* in 1998. These requirements are found in Section 522 of Chapter 173-303 WAC.

People who dispose of used antifreeze instead of recycling it must comply with all of the applicable parts of the *Dangerous Waste Regulations*. WAC 173-303-522, with its reduced regulatory requirements refers to antifreeze that is recycled. Burning used antifreeze for energy recovery and mixing used antifreeze with used oil are both considered disposal methods and are subject to full regulation. Mixing used antifreeze with solvents, gasoline, brake fluid, used oil or anything else removes the option of using the relaxed antifreeze recycling regulations. These contaminated mixtures will most likely need to be managed as hazardous waste.

To make sure other wastes have not been mixed with antifreeze, recycling companies may ask generators how they manage their other wastes. A hazardous waste inspector would expect a generator to be able to answer this same question. The generator of the wastes needs to be able to show that their wastes are being properly designated, counted, managed and disposed.

Proper waste management means that recycling companies will have less hazardous waste antifreeze, workers at the recycling companies will have a safer workplace, and the cost to generators will decrease. If you have questions about how to manage used antifreeze, or any other potentially hazardous waste properly, please call the nearest Ecology regional office and ask to talk to a hazardous waste specialist. You will find the numbers on the back page of this issue.

## New Pesticides Film Available Summer 2002

The Department of Ecology has recently been awarded a grant by the Environmental Protection Agency to produce a short film on how urban pesticide use can adversely affect people and the environment and how such impacts can be avoided.

The film will be produced by internationally praised John deGraaf, producer of the film *Affluenza*. John deGraaf's film-making career is extensive and varied. His products are of very fine quality, based on solid research and peppered with humor and human interest issues.

The film will spend some time covering "people" stories, including interviews with individuals and organizations who use alternatives to conventional pesticides. It will also discuss the advantages that stores in California have seen when they started selling alternatives to conventional pesticides—revenues increased and the number of dissatisfied customers and returns decreased.

The film will be distributed to state and local agencies, schools, PTAs and groups involved with "Kids in the Watershed" programs. This way the information can be integrated in watershed stewardship programs by both kids and adults.

If you are interested in viewing the film when it is completed, or would like more information on the project please e-mail Maria Peeler at [peel461@ecy.wa.gov](mailto:peel461@ecy.wa.gov) or call (360) 407-6704.

## SIC Codes To Be Replaced By NAICS

The U.S. Standard Industrial Classification (SIC) code system is being replaced by the new North American Industry Classification System (NAICS) on the 2001 Dangerous Waste Annual Report Verification Form. The NAICS was developed jointly by the U.S., Canada, and Mexico to provide equivalent statistics about business activity in North America.

Completion of the NAICS codes on the Verification Form is mandatory. A list of five and six digit NAICS codes will be included in the 2001 Annual Report packet. Generators will need to enter the code that best describes the business product or services rendered at their site in the space provided on the form. For more detailed information or to compare the bridge between NAIC and SIC codes, visit the U.S. Census Bureau website at: [www.census.gov/naics](http://www.census.gov/naics).

## Close Up: A-1 Builders, Inc. A 2001 Governor's Award Winner

A-1 Builders, Inc. of Bellingham was recently recognized for their efforts and leadership in the area of sustainable building by receiving a Governor's Award for Pollution Prevention and Sustainable Practices.



Recognizing that building and remodeling generate enormous amounts of waste, A-1 strives to minimize waste and enhance sustainability in every aspect of their work.

A-1 reuses and recycles existing building materials from demolished structures and uses sustainably-harvested materials whenever possible. This helps minimize the use of raw, scarce, and irreplaceable resources. They protect the health & safety of their workers and clients by creating "healthy spaces" and by using non-toxic and biodegradable products. They design projects to reduce environmental impacts and educate their clients to remodel responsibly. A-1 is also a model for their community in the way they conduct business. For example, their bidding vehicle is a Honda Insight (an electric/gas hybrid). They use a point-of-use water heater in the office and have installed drought-tolerant plants in their landscape.

A partner like A-1 Builders can make a remodeling project a successful and educational experience that's also environmentally rewarding. If you can't find such a company in your community, ask your local contractors and hardware stores to work with you to meet higher environmental goals in your projects.

For more information on sustainable building go to [www.ecy.wa.gov/programs/swfa/cdl](http://www.ecy.wa.gov/programs/swfa/cdl). For more information on the Governor's Award visit [www.ecy.wa.gov/sustainability/resources/gov\\_awards](http://www.ecy.wa.gov/sustainability/resources/gov_awards). To be included on the mailing list for the 2002 Governor's Award for Pollution Prevention and Sustainable Practices, e-mail Cathy Bouge at [cbou461@ecy.wa.gov](mailto:cbou461@ecy.wa.gov) or call (360) 407-6719.



Owner Rick Dubrow (left), Design Division Office Manager Jan Hayes, and Expediter Stefan Windroth, (right) receive congratulations from Governor Gary Locke.

## Sustainable Business Workshop

What is a sustainable business and why should you be interested? At its most basic level, sustainable means "meeting the needs of the present without compromising the ability of future generations to meet their own needs." In business terms this means using strategies that combine environmental and economic performance, creating better products, and reducing resource use, waste and pollution.

*The Competitive Advantage through Sustainable Business Workshop* will feature business leaders who are using sustainability as a framework for decision-making and a driver for innovation. They will present tools and strategies for integrating sustainability principles into business operations, and demonstrate how these changes have affected their bottom line.

The workshop will be held at the Kingstad Meeting Center in downtown Seattle on February 28, 2002. The keynote speaker, Joel Makower, is a respected journalist, author, and founder of *GreenBiz.com*.

Whether you are familiar with the concepts of sustainable business, or are just getting started, this workshop will offer a range of opportunities for learning. Breakout sessions with business leaders will address such issues as setting goals, engaging employees and management, implementing a sustainability framework, increasing the use of renewable energy, greening the supply chain, and moving towards zero waste. Speakers in a plenary session will address the challenges they have encountered in the journey towards sustainability and discuss how their organizations have handled these issues. For more information about the agenda and to register, please visit [www.ecy.wa.gov/sustainability](http://www.ecy.wa.gov/sustainability) and click on "Sustainable Business Workshop." If you do not have access to the internet, please call Nancy Mears at (360) 407-7249.



## Questions and Answers:

**Q** What is a Tier Two Report?

**A** Also called an Emergency and Hazardous Chemical Inventory Report, it is a report that many businesses must submit annually for each hazardous substance present at their facility at any time during the previous calendar year if the amounts were in excess of the threshold level. It is required by a Federal law known as SARA Title III Section 312.

**Q** What is a hazardous substance? What is an extremely hazardous substance?

**A** For the Tier Two report, a hazardous substance is any substance that requires a Material Safety Data Sheet (MSDS). Some chemicals are also classified as Extremely Hazardous Substances (EHS) and are identified as such by the manufacturer on the MSDS.

**Q** How do I know if I need to report?

**A** Check each on-site chemical for the maximum quantity present at any one time during the calendar year. EHSs are reportable at 500 pounds or the "threshold planning quantity," whichever is less. All other chemicals are reportable if 10,000 pounds or more is present at any one time.

**Q** What are some examples of threshold planning quantities?

**A** Gasoline and diesel are reportable at 10,000 pounds. Chemicals such as ammonia and chlorine are Extremely Hazardous Substances (EHS) and are reportable at much lower thresholds; the threshold for ammonia is 500 pounds and the threshold for chlorine is 100 pounds.

**Q** When are the Tier Two reports due and how do I report?

**A** Reports for the 2001 calendar year are due March 1, 2002. EPCRAmail, an electronic reporting application, is available from Ecology's website. Businesses with multiple sites will be especially interested in this application.

You may also download a reporting packet by going to Ecology's website at [www.ecy.wa.gov/programs/hwtr](http://www.ecy.wa.gov/programs/hwtr) and clicking on the Community Right-to-Know button. For additional help call (800) 633-7585 and press 1 at the greeting.

## Department of Ecology

Remember, your business is liable for all hazardous wastes generated. If you are uncertain about your responsibilities as a hazardous waste generator, call your nearest Ecology office and ask for a hazardous waste specialist. For information on reducing or recycling hazardous waste, ask for the toxics reduction staff, also at the following numbers:

*Bellevue:* (425) 649-7000

*Lacey:* (360) 407-6300

*Yakima:* (509) 575-2490

*Spokane:* (509) 456-2926

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## Shoptalk

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